



U.S. Department of Justice

United States Attorney
Southern District of New York

86 Chambers Street
New York, New York 10007

October 18, 2023

BY ECF

The Honorable Valerie E. Caproni
United States District Court
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

Re: *Reclaim the Records and Alec Ferretti v. United States Department of State*,
No. 23 Civ. 1529 (VEC)

Dear Judge Caproni:

This Office represents defendant the United States Department of State (the “Government”) in the above-referenced action brought pursuant to the Freedom of Information Act. We write to respectfully request a 45-day extension of the time for the Government to move for summary judgment, from October 23 to December 7, 2023, and extensions of Plaintiffs’ time to file oppositions papers from November 24 to January 8, 2024, and the Government’s time to file its reply papers from December 15 to January 29, 2024.

The reason for this request is that more time is needed to prepare the agency declaration in light of the highly technical nature of the issues presented by a database that may need to be addressed. This is the Government’s first request for an extension of the summary judgment briefing schedule. Plaintiffs consent to the Government’s request.

We thank the Court for its consideration of this letter.

Respectfully submitted,

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Attorney for Defendant

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cc: Plaintiffs’ counsel (by ECF)